

HON. RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CRYSTAL HOWERY,

Plaintiff,

v.

INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE
WORKERS,

Defendant.

No. 14-cv-01814 RAJ

**REPLY MEMORANDUM IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT**

Note on Motion Calendar:
September 11, 2015

REPLY

This matter is before the Court on the Union's Motion for Summary Judgment dismissal of Plaintiff's claims. (Dkt. 60) Plaintiff did not file a brief or other materials in opposition to the motion. Having failed to present any argument as to why her claims against the Union should not be dismissed, the Court should grant the Union's motion and dismiss the Plaintiff's claims with prejudice.

Moreover, Plaintiff appears to have abandoned her case against the Union. She did not oppose the instant Motion for Summary Judgment. She did not respond on the merits to the Union's Motion to Dismiss for Failure to State a Claim (Dkt. 46), stating merely that she "moves

1 for default judgment.”¹ (Dkt. 51) Similarly, her only response to the Union’s Motion to Dismiss
2 for Failure to Prosecute (Dkt. 53) was a statement that she intended to file a motion for default
3 judgment “on or after 8/12/16.” (Dkt. 56, 57). To date, Plaintiff has yet to file any motion in this
4 case. The Union has incurred fees and costs defending this action whereas the Plaintiff has not
5 engaged in the litigation in any meaningful manner. In the interests of justice and fairness to the
6 defending party, Plaintiff’s claims must be dismissed.

7 DATED this 11th day of September, 2015.

8
9 s/Kristina Detwiler

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1 The Union subsequently withdrew this motion and filed the instant Motion for Summary Judgment in its place. (Dkt. 59)

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2015, I electronically filed the foregoing **REPLY MEMORANDUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT** with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following:

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